

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

**BILLIE BURKE, individually and on behalf  
of all others similarly situated,**

Case No. 3:23-cv-01308

Plaintiff,

**AHS MEDICAL HOLDINGS LLC d/b/a  
ARDENT HEALTH SERVICES,  
ARDENT MEDICAL SERVICES, INC.  
d/b/a ARDENT HEALTH SERVICES,**

Defendants.

**ELIZABETH REDD, individually and on  
behalf of all others similarly situated,**

Case No. 3:23-cv-01342

Plaintiff,

**AHS MEDICAL HOLDINGS, LLC d/b/a  
ARDENT HEALTH SERVICES,  
ARDENT MEDICAL SERVICES, INC.  
d/b/a ARDENT HEALTH SERVICES,**

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION  
TO CONSOLIDATE THE RELATED ACTIONS**

For the reasons set forth in the accompanying Memorandum of Law, Plaintiffs in the above-captioned actions respectfully request that the Court (1) consolidate these related cases pursuant to FED. R. CIV. P. 42(a).

A proposed order granting this requested relief is submitted herewith.

Dated: January 16, 2024

Respectfully submitted,

By: /s/ Lisa A. White  
Lisa A. White (TN Bar No. 026658)  
**MASON LLP** (primary office address)  
5335 Wisconsin Ave., NW, Suite 640  
Washington, D.C. 20015

T: (202) 429-2290  
[lwhite@masonllp.com](mailto:lwhite@masonllp.com)

Ken Grunfeld (*admitted pro hac vice*)  
**KOPELOWITZ OSTROW FERGUSON  
WEISELBERG GILBERT**  
One West Las Olas Blvd., Suite 500  
Fort Lauderdale, Florida 33301  
T: (954) 525-4100  
[grunfeld@kolawyers.com](mailto:grunfeld@kolawyers.com)

Kevin Laukaitis\*  
**LAUKAITIS LAW LLC**  
954 Avenida Ponce De Leon  
Suite 205, #10518  
San Juan, PR 00907  
T: (215) 789-4462  
[klaukaitis@laukaitislaw.com](mailto:klaukaitis@laukaitislaw.com)

*\*Pro Hac Vice admission forthcoming*

*Attorneys for Plaintiffs and the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>TH</sup> day of January, 2024, I caused the foregoing **PLAINTIFFS' UNOPPOSED MOTION TO CONSOLIDATE THE RELATED ACTIONS** to be filed electronically with the Clerk of Court by using the CM/ECF system which shall serve a copy on all counsel of record.

*/s/ Lisa A. White*

Lisa A. White (TN Bar No. 026658)